

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF THEIR  
MOTION TO ADD CLASS REPRESENTATIVE**

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF THEIR MOTION  
TO ADD CLASS REPRESENTATIVE**

Plaintiffs Jessica Jones and Christina Lorenzen (“Plaintiffs”) move for leave to file a Reply brief in Support of their Motion to Add Class Representative, ECF No. 394. In support of this Motion, Plaintiffs assert as follows:

1. Defendants opposed Plaintiffs’ motion to add Amy Coulson as a class representative on four grounds: that Plaintiffs’ motion was unduly delayed, that it would be highly prejudicial to Defendants and would undermine their schedule, that it is unnecessary, and that Plaintiffs failed to show that Ms. Coulson would have standing.

2. Defendants fail to provide adequate support for their arguments in opposition to Plaintiffs’ motion to add Ms. Coulson. Defendants do not show how Ms. Coulson’s addition would delay proceedings or prejudice Defendants. And their arguments that adding a class representative is unnecessary and that Plaintiffs have failed to show standing are circular and unsupported by any factual assertions or relevant caselaw. Plaintiffs ask for an opportunity to respond to these claims and assertions. This request takes on added significance in light of Defendants’ recent Motion for Sanctions Under Rule 11 of the Federal Rules of Civil Procedure, (ECF No. 402), which is based in part on Defendants’ contention that Plaintiffs lack standing to bring claims relating to Varsity cheer camps.

3. Plaintiffs seek a short reply, of no more than five pages.

4. For all of the above reasons, Plaintiffs believe that a reply would be helpful to the Court, because it will allow Plaintiffs to address the arguments made by Defendants to which Plaintiffs have not had an opportunity to respond.

Dated: March 15, 2023

Respectfully submitted,

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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**CERTIFICATE OF CONSULTATION**

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that on March 15, 2023, my colleague, Kevin Rayhill, emailed counsel for Defendants (specifically, Mathew Mulqueen and Steven Kaiser for the Varsity, Bain, and Charlesbank Defendants; Nicole Riccio for Defendant USASF, and Brendan Gaffney for Defendant Jeff Webb) advising them that Plaintiffs intended to file a motion seeking the relief set out above and asking if they opposed. I received an email from Ms. Riccio on behalf of all Defendants saying they did not oppose.

Date: March 15, 2023

/s/ Joseph R. Saveri

Joseph R. Saveri